

rejection experience, but on the natural timing differences inherent in the rejection and resubmission process.

Ameritech maintains that the average number of submissions does not, as a general rule, reflect the quality of CLEC access so much as it reflects the quality (or lack thereof) of CLEC orders and is thus not a proper measure of incumbent LEC performance. Further, because the proposed formula uses the number of order rejections in the numerator of the calculation, just like the rejection rate described in the preceding subsection, this measure is redundant.

Should the Commission nevertheless require the measurement of “average submissions,” Ameritech proposes that Average Submissions per Order would be more appropriately calculated by taking the total number of orders that were accepted for provisioning in the period, and dividing it by the Number of Orders Accepted for Provisioning, less the Number of Orders Resubmitted. Ameritech uses “version” numbers to track resubmitted orders; thus, the number of resubmitted orders can be determined by accumulating the number of orders with version numbers greater than one. Ameritech does not object to the proposed level of disaggregation, assuming that non-electronically submitted orders are excluded. Orders for unbundled transport and interconnection trunks should also be excluded from this measure since they are never rejected. Win-back orders should be used as the Ameritech retail analog.

**h. 911 Database Update and Accuracy**

**Percentage of Accurate 911 and E911 Database Updates, and Percentage of Missed Due Dates for 911 and E911 Database Updates (NPRM, ¶¶ 77-79 & App. A, § II.G).** The Commission proposes two potential measures of 911 performance. The first measures the

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accuracy of 911 and E911 database updates based on the percentage of updates completed without error. The second measurement determines the percentage of missed due dates for updates. As an alternative to the second measure, the Commission would allow an incumbent LEC to report the average time to update the database. Each measurement would compare CLEC records to the incumbent LEC's records with no exceptions.

The Commission first asks (§ 77) for comment on whether it is necessary to develop a measurement of parity for 911 or whether state oversight is adequate. As the Commission's *Ameritech Michigan Order* acknowledges (§§ 256-279), 911 and E911 services are local in nature and receive intense scrutiny from both state and local governmental agencies because of their emergency nature. Thus, any 911 service quality issues are immediately identified and promptly remedied at the local level. This local vigilance, combined with the potential liability resulting from errors in the database, make it unlikely that an incumbent LEC would attempt to discriminate against CLECs. Moreover, there is a risk that federal reporting requirements would not only duplicate state and local requirements, but also conflict with them. For all these reasons, Ameritech recommends that the Commission not intrude into this local matter and allow the state and local governmental agencies to continue to oversee this area.

The Commission next asks (§ 78) whether it should measure "Percentage of Accurate Updates for incumbent LEC and competing carrier customers . . . ." Measuring the accuracy of 911 database updates, however appropriate it may appear in theory, does not have sufficient practical utility to justify the effort required to generate it. As the Commission itself acknowledged in its Ameritech Michigan Order, incumbent LECs do not control the quality of

the 911 listing input they receive, nor do they control the process for providing subscriber information for updating the 911 database. Thus, accuracy of updates to 911 databases is not a true measure of incumbent LEC parity, because it gauges the quality of the input provided by the CLEC and reflects, in part, data and steps that are under the control of the CLEC.

For example, CLECs that use their own facilities or unbundled network elements to provide local exchange service develop their own 911 listings for input into the database. Incumbent LECs are not responsible, and should not be held responsible, for the accuracy of the 911 listing data they receive from CLECs. Where incumbent LECs process updates received from the CLEC electronically, the CLEC itself submits the update and controls its accuracy. The proposed measure is also not an appropriate measure of performance because it only measures the number of mistakes made by CLEC personnel, versus those made by the incumbent LEC's own personnel in preparing updates for their customers. The incumbent LEC should not be held responsible for errors made by the CLEC or its agent, nor should it be punished for finding CLEC errors or for properly preparing its own listings. It must be remembered that the overriding goal is an accurate 911 database.

**Average Time to Update 911 and E911 Databases (NPRM, ¶ 79 & App. A, § II.G.2).**

The Commission also asks (¶ 79) about the utility of measuring the timeliness of 911 updates. Ameritech believes that the timeliness of processing 911 updates is an appropriate performance measure. The Commission asks whether average time to process an update, or missed due dates, should be tracked. Ameritech believes that either measure is useful, although each requires significant refinement and analysis before it can be used as a performance measurement.

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It is important to note that the time required to process 911 and E911 updates is influenced by many factors that are not within the incumbent LEC's control. For example, the time of day that the update is received, and the quantity and quality of listings received, all have a profound effect on the time required to process the updates. A CLEC may choose to accumulate updates and submit them in a large batch at the end of the business day or every several days. That CLEC would naturally experience longer processing times than one that sends updates in smaller batches regularly throughout the day.

Currently, Ameritech's business hours for processing 911 update files are Monday through Friday, 12:00 A.M. to 11:59 P.M. (Saturday and Sunday are used for system maintenance and upgrades.) Thus, Ameritech includes weekday non-business hours in calculating update intervals, but excludes weekends. Nevertheless, the time of receipt of an update file still impacts the time required to process it, because Ameritech suspends update processes intermittently from 5:00 P.M. to 8:00 A.M. to generate daily statistical reports. Ameritech's system and resources thus are not available full time to input updates during non-business hours. For this reason, very large files (*e.g.* 25 percent larger than average) that are received after 3:00 P.M. on one day naturally take longer to process and should be deemed to have been received at 8:00 A.M. the next day.

Ameritech also currently tracks the Percentage of Customer Record Update Files Not Processed by the Next Business Day – Received Electronically. This measure is consistent with the one proposed in the Notice, because it incorporates Ameritech's normal due date for processing 911 updates within one business day of receipt. The Ameritech measure, however,

properly deals with the problem of updates submitted on weekends, by basing the deadline on business days.

Ameritech also measures the Mean Time to Process Updates Files – Received Electronically. This report appears comparable to the one proposed by the Commission in Appendix A. This report can be used as a tool in assessing parity, but suffers from the limitation that it does not adjust for the size of the update file submitted, its overall quality and the time it is submitted, all of which can naturally affect the time required to process the file. Ameritech has already discussed how the time of receipt of the file can impact the time required to process it. Also, it is clear that the size of the file will impact the time required to process the file since there are more updates to input into the database when a larger file is submitted.

However, the quality of the file also has a significant impact on processing: As more errors are discovered, more time is required to process the file. As described in detail in Ameritech's Michigan 271 Filing, and as the Commission recognized in its *Ameritech Michigan Order* (¶¶ 265-267), incumbent LECs perform a host of audits and procedures to help detect errors in both content and formatting of the 911 listings provided by both its own personnel and by CLECs. Examples are verification that the address in the listing is a possible address and the telephone number a possible number in use in the area. In cases where an error is detected, the listing is returned for correction to the submitting carrier. This all takes time.

As a result, incumbent LECs should be permitted to exclude from their performance reports any update request that has an error rate that is 25% higher than the average update request submitted by the incumbent LEC and CLECs. The use of the 25% error threshold

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provides a significant margin for deviation over the current error rate average of 7-11% before a file is excluded. Also, as discussed, large update requests (25% larger than average) that are received after 3:00 P.M. should be deemed to have been received at 8:00 A.M. the next day. Moreover, should any given report indicate a potential disparity in performance, the incumbent LEC should be permitted to provide an analysis which may demonstrate that the discrepancy was caused by the CLEC or by other factors outside the incumbent's control.

Both measures of timeliness of processing 911 updates – due dates and mean time – should measure updates received from facilities-based CLECs, including ones that use their own facilities and those that use unbundled network elements. The retail measure should include updates received for end users of resellers and the incumbent LEC's own end users. Ameritech uses the same processes and systems to process both retail and resale requests without any differentiation. Accordingly, it is not reasonably feasible to disaggregate resale from retail updates. The inability to differentiate is the ultimate protection against discrimination and the Commission should not compel carriers to create that capability simply so it can report data.

The Commission should also exclude 911 reports that are submitted manually. There are several reasons for such an exclusion. First, Ameritech submits its update files electronically, and offers the same capability to CLECs. Since the processing of requests received from CLECs manually requires human intervention, they are not comparable to updates processed electronically and do not provide a standard for comparison with the incumbent LEC's own files, which are submitted electronically. Second, because Ameritech provides to CLECs the same

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electronic capabilities that it uses,<sup>6/</sup> it should not be penalized with performance for carriers that choose not to take advantage of those capabilities. Third, the Commission should strongly encourage all carriers to support and use superior electronic processes. Fourth, Ameritech does not today measure updates that it receives manually. The tracking of this data would need to be done manually, which is both expensive and an inefficient use of personnel, who should focus on processing updates. The only exception is that, Ameritech currently tracks, on an interim basis, the time required to process manual updates in Michigan, at a cost of around \$65,000 per year. The cost to develop such a capability across Ameritech's region would be about \$200,000 per year. Clearly the little, if any, benefit of this data as a performance measure is outweighed by the costs and time it will require to prepare it.

Ameritech's 911 reports do not reflect data on specific updates, but rather on the processing of update files. An update file is basically a batch of updates that a CLEC or Ameritech's own systems submit at one time. A file may contain many updates. For administrative convenience and cost control reasons, Ameritech has chosen to focus on reporting on files rather than the updates that make up those files. For example, although Ameritech processes around 1 million updates each month, they are contained in around 600 files. As a result, Ameritech proposes that the Appendix be amended to clarify that incumbent LECs may, at their option, report on the basis of either updates or update files.

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<sup>6/</sup> Indeed, Ameritech also makes available several options for electronic capabilities that it does not use itself.

3. **Repair and Maintenance Measurements**

**Average Time to Restore (NPRM, ¶ 82 & App. A, § III.1).** The purpose of this measurement is to “allow[] a competing carrier to gauge whether its customer’s services are repaired in the same time frame as that of an incumbent LEC’s customers. NPRM, ¶ 82. Ameritech agrees in principle with such a measurement (which has also been described in the past as “mean time to repair,” or “receipt to restore”) but submits that the formula proposed by the NPRM would be inapplicable to most troubles, and does not correspond to the measurement’s objective. Further, certain types of repairs should be excluded from the calculation in addition to the exclusions proposed by the Commission. Finally, Ameritech objects to the proposed 19-layer disaggregation as unduly burdensome and not cost-effective.

With respect to the calculation formula, the Commission proposes that the restoral period include the time for the incumbent LEC to return a trouble ticket resolution notification to the competing carrier. Ameritech provides notification of trouble ticket resolution only in the case of electronically submitted trouble tickets, but the notification time is not passed on to or recorded by downstream systems. Moreover, almost all CLECs have chosen to submit trouble reports by non-electronic means (*e.g.*, telephone calls, faxes). The Commission properly recognizes that manually submitted transactions should be excluded, because incumbent LECs use electronic processes and make them available to CLECs. Thus, it would not be possible to use the proposed formula with the consistency necessary for evaluation. Further, by adding notification time as well as repair time, the formula does not correspond to the stated



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measurement objective: isolating the time required to repair service for CLEC customers as compared to retail customers.

Therefore, Ameritech recommends that the restoral period be measured based on service restoral time on customer reported trouble tickets, minus the time that the trouble ticket was logged by the incumbent LEC divided by the number of trouble tickets resolved in the reporting period.

Ameritech agrees that the following categories of repairs be excluded from this calculation so as not to skew results: namely, trouble tickets canceled by the competing carrier, incumbent LEC trouble reports associated with internal or administrative use of local services, and instances where the customer asks that the trouble ticket be held open for monitoring. In the same vein, Ameritech recommends that categories of repairs also be excluded from the calculation:

- Repairs that are delayed because the end user does not allow service personnel access to its premises, or that are otherwise delayed by the CLEC or end user;
- Repairs for which the customer selects the date of repair;
- Subsequent trouble reports on open tickets (i.e., a customer calling for status of a trouble ticket that has already been opened, or when a second person calls in a trouble that has already been reported; the Commission appropriately excludes such repairs in its calculation of "repeat troubles," and should exclude them from this calculation as well);
- Trouble tickets involving interexchange carriers, and requests for information;

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- Trouble tickets where the source of the problem is determined to be the customer's own premise equipment;
- Trouble tickets where investigation determines that there are no problems.

Ameritech proposes measurement categories based on disposition codes. These codes identify actual troubles that have been repaired by the incumbent LEC. For maintenance and repair purposes, this is more logical and less costly than dispatch versus non-dispatch.

One of the problems with dispatch versus non-dispatch in the maintenance and repair environment is the handling of cable troubles. The first ticket reported on a cable damage is the only ticket marked as requiring dispatch, even though there could be 300 cases of reported troubles on a particular cable damage. A 300-line cable damage would take much longer to clear than a single line trouble and yet each would only count as 1 dispatch. This would not allow the carrier to gauge whether its customers' services are repaired in the same time frame as the incumbent LEC's customers.

In addition, Ameritech recommends that interconnection trunks not be measured because the measure would be redundant with the comprehensive call completion measure proposed by Ameritech in the Interconnection Measurements section below.

**Frequency of Troubles in 30-Day Period (NPRM, ¶ 83 & App. A, § III.2).** The Commission intends this measurement to "determine on an ongoing basis whether [CLEC] customers experience more frequent incidents of trouble than the incumbent LEC's end users," which may in turn indicate differences in the underlying quality of the network components. NPRM, ¶ 83. The formula employed, however, is not appropriate for this objective. First, the

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proposed numerator for the formula is the number of trouble tickets received. Trouble tickets are measured by their closed date, rather than their receipt date. Ameritech proposes that the numerator be the number of initial trouble reports *closed* to be consistent with current systems design capabilities. Thus, for example, trouble reports received on the 31st of one month, and closed on the 1st of the subsequent month, would be reported in that subsequent month. Second, the proposed formula measures the rate of troubles for each type of product or service (*e.g.*, resale, unbundled loops) against the same, undefined denominator, which is described generically as “number of service access lines in service,” and which appears suited only to measuring the number of access lines in service at the beginning of the reporting period. To ensure apples-to-apples comparisons for all categories, the number of trouble reports for a given product or service should be compared to the applicable total of lines corresponding to that particular product or service.

Thus, the denominator for unbundled loop troubles should be the total number of loops reported in service; the denominator for unbundled switching troubles should be the total number of switch ports in service; and the denominator for unbundled transport should be the total number of circuits in service. Ameritech objects to any measurement for “combinations” for the reasons described in the section on Disaggregation of Data above. Likewise, Ameritech objects to a separate measure for interconnection trunks here, because it would duplicate the call completion measure described in the section on Interconnection Measurements below.

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The suggested reporting period of thirty days appears reasonable. Ameritech recommends, however, that the reporting period be based on the calendar. This would simplify the cut-off of data while still approximating thirty days of activity.

As for repair types to be excluded from the calculation, Ameritech concurs with the Commission's proposed exclusion of trouble tickets canceled by the competing carrier, incumbent trouble reports associated with internal or administrative use of local services, and instances where the customer asks that the trouble ticket be held open for monitoring. In addition to these categories, Ameritech recommends that the following trouble reports be excluded, because they do not reflect on the quality of the incumbent LEC's network components, and thus do not meet the stated objective of the measure:

- Trouble tickets where the source of the problem is determined to be the customer's own premise equipment;
- Trouble tickets where testing or investigation determines that there no problems;
- Subsequent trouble reports on open tickets (the Commission appropriately excludes such repairs in its calculation of "repeat troubles," and should exclude them from this calculation as well);
- Trouble tickets involving interexchange carriers, and requests for information.

The disaggregation categories proposed are the same as for the "average time to restore" measure, and are detailed in Appendix A.

**Frequency of Repeat Troubles in 30-Day Period (NPRM, ¶ 84 & App. A, § III.3).**

Ameritech concurs with this proposed measurement as modified under the discussion of Frequency of Troubles in a 30-day Period.

**Percentage of Customer Troubles Resolved Within Estimated Time (NPRM, ¶ 85 & App. A, § III.4).** Ameritech concurs with this proposed measurement, but proposes the same exclusions and disaggregations as discussed under the “average time to restore” measure.

Ameritech further recommends that the Commission exclude customer troubles referred to other offices, such as the business office, because these calls are likely not trouble reports. For example, a customer may ask why “call waiting” is not working when, upon investigation by repair personnel, it is discovered that the customer never ordered it. Further, trouble reports on customer premises equipment should be excluded from this measure.

**4. Billing Measurements**

**Average Time to Provide Usage Records (NPRM, ¶ 89 & App. A, § IV.1).** The purpose of the measurement is to assess the timeliness of the incumbent LEC making available to the competing carrier the customer usage records of the competing carriers’ customers. The CLEC in turn uses this information to bill its end users.

Ameritech currently measures the percentage of usage records transmitted within 5 days. Current Ameritech performance shows that 98 percent of all usage records are transmitted within 5 days. The 5 day standard is also used by AT&T in its own established process for measuring Ameritech performance.

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The NPRM nevertheless proposes a call-record-by-call-record calculation of an “average” speed of usage reporting, comparing the date and time of the call record to the date and time that the related usage record is transmitted. Neither of these date-and-time referents are available in Ameritech’s billing system as it exists today. First, in order to ensure that calls that span calendar days do not skew performance results, the call record time would need to be based on the call completion time. However, Ameritech’s call records do not directly provide call completion time. Rather, the call completion time would have to be derived by reference to call origination time and the elapsed time of the call. This would require an extensive program rewrite, requiring several hundred thousand dollars in development costs, as well as roughly \$100,000 in annual processing costs.

Similarly, Ameritech’s systems do not record the exact time that a usage record is provided, only the date -- because the date is, after all, the agreed-and-approved benchmark. Recording and tracking time to the hour and minute would again require yet another program change, the cost of which would far outweigh any marginal benefit.

The costs involved with tracking average speed of usage records increase exponentially when one considers the volume of records involved. Current CLEC call record volumes run into the millions *each day*. Therefore, each of the two calculation routines (calculation of the completion time of the call and calculation of the elapsed delivery time) would need to be applied against tens of millions of call records on a monthly basis. Once these two calculations are performed, an average would then need to be calculated against the tens of millions of records. Substantial system processing resources and time would obviously be needed to process

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this large number of transactions, and this would become even more cumbersome and costly as competitive carrier call volumes continue to grow.

The NPRM's proposal that incumbents LECs create and then measure a retail analog compounds costs further. The proposed retail calculation is based on the date and time that a record is "reformatted to an EMR." NPRM, ¶ 89.<sup>2/</sup> But this reformatting occurs early in the message processing stream, before the system even "guides" the record to the appropriate end user account. At this point, Ameritech cannot associate the record with an account (customer), and it does not have the record in a usable format. It would not be appropriate to compare the time for an incumbent LEC customer record to reach a preliminary, but still unusable point, against the time for a CLEC record to complete all the steps needed for billing to occur. Rather than require the incumbent LEC to implement yet another costly and burdensome process to measure its performance and draw false parity assessments, a more logical point in the message processing stream to draw such an assessment would be after the record has been guided. At this point, the billing party has been identified.

The inappropriate calculation point proposed by the NPRM, however, is only a symptom of a more fundamental flaw: the fact that no retail analog can exist in the first place. The process of putting together a daily usage file that captures and summarizes all of the customer call records associated with a given CLEC adds on an extra day of processing that does not occur on the retail side, where individual end users are billed directly.

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<sup>2/</sup> The standard format utilized by Ameritech is the Exchange Message Interface ("EMI"). EMI is the successor to EMR.

The proposed level of disaggregation for these measures further complicate matters without adding utility. The NPRM suggests disaggregation by "Access usage records" and "Alternately billed usage records." "Access usage records" represents toll usage; however, toll end-user records are processed in the same way and by the same system as local records, and disaggregation would not add value. Meanwhile, "Alternately billed usage records" refer to end-user records from a CLEC's resold line that are originated and recorded on the incumbent LEC network, but billed to a third party. These calls are processed the same way as local and toll end-user records. Here again, disaggregation would not be meaningful. Moreover, "Alternately billed usage records" would cover small call volumes that do not warrant separate reporting.

In summary: Reporting average usage record speed for CLECs would require substantial system changes, while reporting average usage record speed in any comparable form on the retail side would be infeasible. The proposed levels of disaggregation serve only to increase costs without adding value. Thus, the Commission's proposed measure of average usage record speed does not meet any reasonable cost-benefit test. Ameritech already employs a performance measure to address the speed of usage record provision (percentage of records not provided within 5 days). Ameritech has modified and geared its systems to report on that level. And current Ameritech resale performance meets that standard.

**Average Time to Deliver Invoices (NPRM, ¶ 90 & App. A, § IV.2).** This proposed measurement suffers from the same defects as the proposed measure for usage record speed described above. Ameritech already reports the percentage of bills (segregated by resale and network element bills) not delivered within a specified interval, typically expressed in days.



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The NPRM, however, adds much cost with little reporting value. It would require Ameritech's systems to record bill provision to the hour and minute, rather than the daily increments used in current practice, and then compute averages not only for resale and network element bills (which run in the hundreds per month) but also for individual retail bills (which run in the millions) . As with the average usage record speed described in the preceding section, there has been no showing that the hour-and-minute presentation has any meaning or service impact. To the contrary, Ameritech's experience demonstrates that measurement of bill provision in days is sufficient.

The proposed retail analog is as nonexistent as the proposed CLEC measure is costly. The Commission proposes basing the calculation on "the date and time invoices produced in an electronic format." Ameritech's primary bill media for retail is paper. More, no valid measure of parity could exist. The resale billing process, by its very nature, requires additional processing time: Retail bills are issued directly to the end user. By contrast, in the resale environment, end-user billing must not only be completed, but then competing carrier end user billing data must be accumulated, disconnected, and guided to the appropriate competing carrier before a resale bill can be rendered.

Likewise, because resale and network element billing is at the company-to-company level (that is, the incumbent LEC sends a bill to each CLEC), the current monthly volume for such bills runs only in the hundreds for the Ameritech region. Retail bills, however, go from Ameritech to each individual Ameritech end user: The current monthly retail volume is thus in

the millions. Given the inherent disparity in monthly volumes, the proposed comparison of billing speed would not be meaningful.

**5. General Measurements**

**a. Systems Availability**

The purpose of this measurement (NPRM, ¶ 91 & App. A, § V.A) is to assess whether the incumbent LEC provides nondiscriminatory access to its electronic interfaces. Ameritech agrees that the measurement definition and calculation appear to provide for a proper assessment of interface availability; that is, the percentage of scheduled time (excluding regular downtime) that the interface is available to accept input. Some refinements are, however, appropriate.

First, the NPRM proposes that this measure be disaggregated by interface type as well as by OSS function. Ameritech proposes instead that this measure be disaggregated by interface type only since availability is driven by the interface, not the function. For example, if an individual function is not available via the interface, the entire interface should be considered unavailable.

Second, the NPRM proposes a retail equivalent disaggregated by OSS function. No true retail equivalent exists, however, since the OSS interfaces are not available to Ameritech's retail units. Ameritech "win-back" personnel use the same interfaces as CLECs; their availability rates would, by definition, be identical to CLECs and thus uninformative.

**b. Center Responsiveness**

The purpose of the measurement (NPRM, ¶ 92 & App. A, § V.B) is to assess the amount of time it takes an incumbent LEC's service center to answer calls from competing carriers. The measurement definition and calculation appear to provide for a proper assessment of center responsiveness.

**c. Operator Services and Directory Assistance**

The Commission proposes a single measurement for two separate services: operator services ("OS") and directory assistance ("DA"). NPRM, ¶¶ 93-94 & App. A, § V.C. It proposes that incumbent LECs measure the time of response of OS/DA operators or databases in two categories – CLEC calls and incumbent LEC calls, with no exclusions. Ameritech proposes separate measures for OS and DA because they involve separate processes that can produce significantly different results. Moreover, CLEC and retail customer calls should not be disaggregated by incumbent LECs whose systems do not differentiate between them.

In the NPRM (¶ 93) the Commission explains that incumbent LECs should measure the "average time its takes its own end user customers and those of competing carriers to access the incumbent LEC's operator services and directory assistance databases or operators." The NPRM also indicates (¶ 94) that incumbent LECs "appear to be able to provide separate measurement results for competing carriers that use dedicated trunks to access the incumbent LEC's OS/DA database and operators." The Commission asks the parties to address whether or not incumbent LECs can differentiate between OS/DA calls that are carried on the same common trunks that it

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uses to carry its own OS/DA traffic. The Commission is mistaken on both counts, at least as to Ameritech.

In answer to the Commission's question, although Ameritech's OS and DA systems can "brand" CLEC OS/DA traffic with the CLEC's name, the system does not now have the capability to report speed of answer separately for CLEC versus Ameritech end users, nor can it distinguish between traffic received on dedicated trunks versus traffic received on common trunks for speed of answer purposes. In order to brand OS or DA traffic with a CLEC's name, the system must be able to identify the traffic as belonging to the CLEC. This is only possible where Ameritech's OS or DA systems receive the traffic on separate trunks dedicated to the CLEC, so the equipment can identify the source of the traffic and brand it accordingly. Notably, branding is performed mechanically, at the front end of the process, and not by Ameritech's operators. Once the call is branded, it is then submitted to Ameritech's automatic call distribution ("ACD"), which automatically submits calls to the next available operator on a first come, first served basis. Once the CLEC's call is submitted to the ACD, the system is unaware of the source of the call, and processes all calls on the same nondiscriminatory basis.

The best possible protection against discrimination is the technical impossibility of doing so, and it therefore would be counterproductive for the Commission to require that incumbent LECs create the ability to discriminate, at significant expense, simply so they can prepare a report. For this reason, the fact that Ameritech's OS and DA systems do not uniquely identify the dial tone provider during call set-up, but treats each request on a first-come-first-serve basis, clearly should be viewed as the best proof of nondiscrimination. It would be very expensive

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(around \$350,000 per switch or \$9.4 million for Ameritech as a whole) to deploy the software and facilities necessary to differentiate between CLEC and retail traffic. In addition, Ameritech would incur about \$700,000 to create the capability to generate an appropriate report. Further, it would take approximately 12 to 24 months to deploy the necessary hardware and software. While some LECs may be deploying this capability, others, including Ameritech, are not.

In summary, Ameritech proposes that the Commission permit incumbent LECs that report speed of answer at the state level to continue to use those reports for the purposes of meeting the guidelines of Appendix A. In fact, Ameritech currently satisfies or exceeds the “speed of answer” standards established by the state regulatory commissions having authority over the provisioning of such services within the Ameritech region. Ameritech believes that incumbent LECs that have not deployed the capability in their OS and DA switches to differentiate between traffic of CLECs and its own end users should not be required to report CLEC and incumbent OS or DA speed of answer separately.

**6.     Interconnection Measurements**

**a.     Trunk Blockage**

The NPRM proposes measurement of percent blockage on trunks, and asks parties to address the possible measurement of call completion data as an alternative or in addition to the measurement of trunk blockage. NPRM, ¶¶ 96-101 & App. A, § VI.A. As shown below, current methods for measuring trunk blockage are not the best feasible gauge of overall network performance parity. Accordingly, Ameritech proposes the optional use of a new measure, call

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completion data, which is specifically designed to provide an accurate and complete measure of performance.

Trunk blockage reports are not designed to measure service quality, but rather to assess the effectiveness of one network component (a trunk group) in supporting network engineering objectives. For this reason, the trunk blockage reports do not track calls to their ultimate destination to determine if they were completed. Moreover, trunk blockage reports do not and reasonably cannot reflect the actual volume of traffic involved, nor do they reflect traffic handled during non-busy hours of the day. By contrast, call completion statistics can track calls to their final disposition, reflect actual call volumes involved, and can measure all traffic over any time intervals, including 24 hours.

For these reasons, Ameritech agrees that incumbent LECs should be given the option of reporting call completion rates, rather than trunk blockage reports. Call completion data provides a more complete picture of overall network performance and are more closely tied to the Commission's objective and should therefore supersede the need for trunk blockage reporting. In fact, Ameritech is developing a call completion report (Appendix C) and has found that it can be developed and generated on an automated basis at a relatively modest cost of approximately \$100,000, plus \$4,000 per report.

To the extent that trunk blockage data are required, certain modifications to the reporting procedures will help to improve their accuracy and usefulness. The NPRM proposes that incumbent LECs report blockage on two different types of trunks – interconnection and common. NPRM, ¶ 97. The trunk blockage on interconnection trunk groups would be

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determined by dividing the number of final interconnection trunk groups that are experiencing blockage above a specified objective during a limited period (usually the average busy hour for the trunk group) against the total number of interconnection trunk groups. The percent blockage on common trunk groups would likewise be derived by comparing common final trunk groups expressing blockage above the objective during the reporting period versus the total number of common final trunk groups.

The Commission seeks comment (§ 98) as to whether incumbent LECs should report “repeated blockage over the same trunk group for an ongoing period such as three months.” Ameritech agrees with the Commission that the duration of a call or trunk blockage situation and efforts to remedy it are important factors in assessing the urgency of engineering issues and in developing and implementing a solution.

The Commission further seeks comment as to whether “incumbent LECs should report on blockage exceeding a certain standard for both interconnection and common trunk group measurements.” NPRM, § 98. The Commission provides as an example blockage over a standard of B.01 for interconnection trunks and B.05 for common trunks. The Commission also desires that parties comment on methods to evaluate whether an incumbent LEC is meeting its obligations. The Commission asks about the utility of comparing blockage on interconnection trunk groups to blockage on the incumbent LEC’s interoffice trunk groups carrying its retail traffic. The Commission further seeks comment on whether incumbent LECs should measure blockage on common trunk groups using the Bellcore Special Report SR STS-000317. The

Commission also asks if incumbent LECs should report on common trunks connected to an interconnection point versus ones that are not.

**Percent Blockage on Interconnection Trunks.** Ameritech currently reports the percent blockage on interconnection trunk groups as the percentage of end office integration (EOI Final) trunk groups between an Ameritech tandem switch and a CLEC end office that experience average blockage above the specified service objective during the average busy hour. For intraLATA traffic, this objective is set at one percent; the interLATA objective is one-half of one percent. The report does not reflect the size of the trunk groups involved, nor the actual volume of traffic being blocked. Further, the reports highlight instances in which average blockage exceeds an average level. However, one would expect that blockage would exceed the objective about half the time, and would fall below the objective the other half. Thus, a reported blockage on a trunk group does not automatically mean that blockage is at an unacceptable level.

**Percent Blockage on Common Trunks.** Turning to the issue of blockage reporting for common final trunk groups, it is first useful to define what will be reported. "Percent blockage of common trunks" is a measure of common final trunks groups within Ameritech's network (i.e., trunk groups that are behind Ameritech's tandem switches) that are blocking traffic above the applicable service objective during the average busy hour. Final trunk groups are measured because they do not automatically overflow to other trunk groups and, therefore, blockage on these trunk groups may mean that the traffic is not being completed. It is important to remember that trunk blockage reports do not currently reflect the size of the trunk groups involved (the number of trunks in the groups), the actual volume of calls blocked, nor if the traffic was



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successfully rerouted to other trunk groups. Rather, they identify trunk groups that are experiencing average blockage rates above the objective level during the average busy hour of the day. Moreover, trunk blockage reports do not seek to determine the cause of the blockage or whether the incumbent LEC is at fault. Rather, they are designed to identify portions of the incumbent LEC's network where augmentation, reconfiguration or other remedial measures may be required.

For intraLATA traffic, percent blockage is currently measured as the percentage of direct final trunk groups (i.e., trunk groups that carry "first routed" Ameritech local and intraLATA toll traffic, and do not overflow to other facilities when blockage occurs), which are blocking at a rate of 1% or more during the average busy hour. For interLATA traffic, percent blockage on common trunks is currently measured as the percentage of alternate final trunk groups (i.e., trunk groups that carry "first routed" Ameritech local, intraLATA toll, and inter LATA toll traffic and receive overflowed calls from other trunk groups), which are blocking at a rate of 0.5% or more during the average busy hour.

Further, the current process reports any trunk groups that are experiencing average blockage rates above the service objective. However, the service objective itself is defined to be an average; that is, around half the time performance will be above the stated objective while performance will fall below the objective the other half. Here again, simply exceeding the objective of 1% or .5% blocking does not in and of itself establish that reasonable network performance is not being maintained.